

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

VERIZON COMMUNICATIONS  
INC., et al,

Defendants.

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

Civil Action No. 2:23-cv-00352-JRG-RSP

**ORDER**

The Court issues this Order to resolve first day deposition designation disputes. The Court—having now reviewed the transcripts of the depositions, any contemporaneous objections (or lack thereof), and the Parties’ objections made following the pre-trial conference<sup>1</sup>—makes the following rulings:

**March 26, 2025 Deposition of Thomas Russel**

- 57:5-12 – The objection is sustained.
- 70:17-71:6 – The objection is overruled.
- 71:7-71:24 – The objection is sustained.
- 71:25-72:16 – The objection is overruled.
- 92:4-17 – The objection is overruled.
- 105:13-106:5 – The objection is overruled.
- 132:21-133:2 – The objection is sustained.
- 135:21-136:13 – The objection is overruled.

---

<sup>1</sup> See Dkt. No. 348 at 2.

- 136:14-136:23 – The objection is sustained.
- 136:24-137:8 – The objection is overruled.
- 137:9-138:1 – The objection is sustained.
- 139:5-25 – The objection is sustained.
- 140:20-141:6 – The objection is overruled.
- 213:5-9 – The objection is overruled.
- 213:10-214:8 – The objection is sustained.

**Use of errata for January 10, 2025 Deposition of Kartik Umamaheswaran**

- Use of errata as to 125:15-126:3 – The objection is sustained; this is an improper use of errata.
- Use of errata as to 132:15-21 – The objection is sustained; this is an improper use of errata.
- Use of errata as to 135:20-25 – The objection is sustained; this is an improper use of errata.
- Use of errata as to 140:8-24 – The objection is sustained; this is an improper use of errata.
- Use of errata as to 148:18-25 – The objection is sustained; this is an improper use of errata.
- Use of errata as to 168:7-12 – The objection is sustained; this is an improper use of errata.

**SIGNED this 25th day of June, 2025.**

  
ROY S. PAYNE  
UNITED STATES MAGISTRATE JUDGE